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Sent: Wednesday, July 28, 2010 1:26 PM
To: jmeral@horizoncable.com; Minton, Jonas; Grindstaff, Joe@DeltaCouncil; K_night
Pale; ann levitansky; list; herz
Subject: some remarks on Draft Development of Flow Criteria for the Sacramento - San
Joaquin Delta Ecosystem

----- Original Message -----

From: [Michael Rozengurt](#)
To: [MMcIntyre](#) ; [pbmoyle](#) ; [Ruben](#) ; [tom stokelly](#) ; [suzanne.bolton](#)
Sent: Wednesday, July 28, 2010 1:20 PM
Subject: : some remarks on Draft Development of Flow Criteria for the Sacramento -
San Joaquin Delta Ecosystem

Phil Crader
State Water Resources Control Board
P.O.Box 100 Sacramento, CA 95812 - 0100

**Subject: some remarks on Draft Development of Flow Criteria for the Sacramento -
San Joaquin Delta Ecosystem**

1. *It seems to me that proposed current flow criteria assumed to serve existing
conditions into Delta (Board).*

*If this correct the questions one may raise - **why agonizing deltaic environment
must have these not suitable criteria?***

2. *Normally, professional hydrologists tend to install statistically validated criteria to stop
gradual deprivation deltaic environment? May I think that Board erroneous attitude to
role of criteria for years used to be result **the lack of professionalism that led to
final current despoliation of the Delta?***

3. *Unfortunately, discussion about flow criteria and percentages of runoff discharges by
season illustrate **inherited confusion in understanding of deltaic environment due
lack of professional hydrologists** (Awarded by American Institute of Hydrology)
and **coastal oceanographers** who have special expertise related to processes taking
place with river continuum to estuaries and coastal seas. For example, 75% of
unimpaired Delta outflow for season to maintain deltaic adapted conditions for native
fish species is wrong camouflage
of **25 % of Norm per season which I have brought to attention to scientists and
official of California in 1980 -1981. At that time, I made statement, based on
numerous stdies, on local meetings, and reports for DWR and Resources Agency,
and publication that not more then 25 % of perenial norms for month, season, and
year can be withdrawn from runoff without noticeable damage for River - Delta
ecosystem living resources.***

Therefore, the Board "crafted" nothing! But produced confused criteria.

4. *In this regard, I am flabbergasted by degree of ignorance of amount of local, State,
and international literature which discussed : Delta - Estuaries monitoring, methods of
statistical evaluation of periods of runoffs observations, how validate of runoff study,
their major statistical parameters, and their possible effect on the Delta - estuarine*

environment and adjacent coastal sea, and many others special approaches which provide substantial help to understand this "TERRA INCOGNITO"?

Sorry, I did not notice these kinds of acceptable studies, recommended by UNESCO and other professional institutions, that were implemented by the Delta Environmental Flows Group as well as Board.

Cordially,

Michael Rozengurt, P.H.,Ph.D.